

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

PACKAGING CORPORATION OF
AMERICA,

Plaintiff,

v.

LUNDBERG, LLC f/k/a A.H. LUNDBERG
ASSOCIATES, INC., DUSTEX
CORPORATION d/b/a LDX SOLUTIONS,
and A.H. LUNDBERG SYSTEMS, INC.,

Defendants.

Case No. 2:19-cv-01770-MJP

**STIPULATION REGARDING AMENDED
COMPLAINT**

Complaint Filed:
Trial Date:

October 31, 2019
None Set

Counsel for Packaging Corporation of America (“PCA”) have conferred and met with counsel for Lundberg, LLC and Dustex Corporation d/b/a LDX Solutions (“Lundberg”) and now stipulate to PCA filing an amended complaint pursuant to Local Rule 15. The proposed amended pleading is attached to this stipulation as Attachment A. All proposed changes are indicated by striking through the text to be deleted and underlining or highlighting the text to be added.

As set forth in Attachment A, counsel for Lundberg have indicated that Dustex Corporation is not a proper party in this lawsuit, and if any Dustex entity should be named in the lawsuit, it should be Dustex, LLC d/b/a LDX Solutions. Counsel for Lundberg have further

1 indicated that Dustex, LLC consents to venue and personal jurisdiction. No substantive
2 allegations have been added or removed from the complaint in the proposed amended complaint.

3 With respect to the pending motion to dismiss, PCA and Lundberg are prepared to remain
4 on the same briefing schedule that was ordered by this Court (Dkt. 16).

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6 Dated: January 9, 2020

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20 PACKAGING CORPORATION OF AMERICA

21
22 Dated: January 9, 2020

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Attorneys for Defendant
LUNDBERG, LLC D/B/A LDX SOLUTIONS

1 **ORDER**

2 IT IS SO ORDERED.

3 Dated: January 9, 2020
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9 Marsha J. Pechman
10 United States District Judge
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